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9 Attorneys for Defendant
JASON EDWARD THOMAS CARDIFF
10

11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA
13

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 vs.

17 JASON EDWARD THOMAS
18 CARDIFF,

19 Defendant.
20

Case No. 5:23-cr-00021-JGB

**JASON CARDIFF'S OPPOSITION
TO PLAINTIFF'S *EX PARTE*
APPLICATION FOR
CONTINUANCE OF HEARING ON
MOTIONS TO DISMISS**

21 The Government's Ex Parte Application for Continuance of Hearing on
22 Motions to Dismiss should be denied in part. The Government refuses *any*
23 continuance of the trial date for Defendant despite his health condition and impact on
24 trial preparation, but does not want to comply with the Court's deadlines on
25 responding to motions. The Government asks the Court to file their oppositions
26 within two weeks filing their opposition on December 23, 2024 while allowing
27
28

1 counsel only one week (over the Christmas holiday) to file a reply brief to both
2 motions.

3 In pertinent part, the Government states that it did not learn “of defendant’s
4 motion” [singular] until November 27, 2024 while on leave, that applies only to the
5 double jeopardy motion. The motion based on *United States v. Aguilar*, was brought
6 to the Government’s attention at least six to eight weeks ago.

7 For the above reasons, and other reasons set out in Defendant’s Ex Parte Motion
8 to Continue Trial Date (Dkt. 139), the Court should grant Defendant’s request for trial
9 continuance and deny the Government’s motion as moot. An opposition to
10 Defendant’s motions could be set for the January 6, 2025, response for Defendants in
11 January 20, 2025 and a hearing set for February 3, 2025.

12 Respectfully submitted,

13
14 /s/ Stephen R. Cochell

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22 **SERVICE LIST**

23 I HEREBY DECLARE THAT THE FOLLOWING COUNSEL HAVE BEEN
24 SERVED WITH THIS DEFENDANT JASON CARDIFF’S NOTICE OF MOTIO
25 AND MOTION TO SUPPRESS EVIDENCE THROUGH THE COURT’S ECF O
26 NEXT GEN ELECTRONIC FILING SYSTEM:

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10 /S/ Stephen R. Cochell
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